

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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PAULA F. SOTO,  
Plaintiff,

v.

C.A. No. 13-10822-JGD

CITY OF CAMBRIDGE,  
Defendant.

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**DECLARATION OF SAMUEL A. AYLESWORTH IN SUPPORT OF DEFENDANT  
CITY OF CAMBRIDGE'S MOTION TO JOIN THE COMMONWEALTH AS A  
REQUIRED PARTY DEFENDANT PURSUANT TO FED. R. CIV. P. RULE 19(a).**

I, SAMUEL A. AYLESWORTH, pursuant to 28 U.S.C. § 1746, hereby declare the following under penalty of perjury:

1. I am an Assistant City Solicitor for the City of Cambridge and am counsel of record for the Defendant City of Cambridge (the "City") in this action. I am a member in good standing of the bar of Massachusetts and I am admitted to practice in the United States District Court for the District of Massachusetts. I submit this declaration in support of City's Motion to Join the Commonwealth as a Required Party Defendant Pursuant to Rule 19(a). I have personal knowledge of the statements contained in this declaration and, if called as a witness, would testify competently to the statements contained in this declaration.

2. Attached hereto as Exhibit A is a true and accurate copy of Cambridge Municipal Ordinance Chapter 9.04 as amended on May 18, 2015.

3. Attached hereto as Exhibit B is a true and accurate copy of the City's proposed Amended Answer to the Amended Complaint.

4. Attached hereto as Exhibit C is a true and accurate copy of a print out of the Commonwealth of Massachusetts' Attorney General's Administrative Law Division web page (last visited on May 26, 2015).

5. Attached hereto as Exhibit D is a true and accurate copy of a letter dated September 19, 2014 from William W. Porter, Chief of the Administrative Law Division for the Commonwealth of Massachusetts Attorney General's Office to Thaila Sundaresan, Esq., counsel for Paula F. Soto (now withdrawn).

6. Attached hereto as Exhibit E is a true and accurate copy of a letter dated May 7, 2015 from Samuel A. Aylesworth, Esq., counsel for the City to Julia Ong, Esq., counsel for Paula F. Soto.

I, SAMUEL A. AYLESWORTH, declare under the pains and penalties of perjury that the foregoing is true and correct. Executed in Cambridge, Massachusetts on May 29, 2015.

/s/ Samuel A. Aylesworth

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of this document was filed through the Electronic Case Filing (ECF) system and thus copies will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF); paper copies will be mailed to those indicated on the NEF as non-registered participants on or before May 29, 2015.

/s/ Samuel A. Aylesworth